

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

SOUTH CAROLINA FREEDOM CAUCUS,

Plaintiff,

v.

WALLACE H. JORDAN, JR., J. DAVID WEEKS,
BETH E. BERNSTEIN, PAULA RAWL CALHOON,
MICAHAH P. CASKEY, IV, NEAL A. COLLINS,
JOHN RICHARD C. KING, ROBBY ROBBINS,
J. TODD RUTHERFORD, AND LEONIDAS E.
STAVRINAKIS, in their official capacities as
members of THE HOUSE OF REPRESENTATIVES
LEGISLATIVE ETHICS COMMITTEE,

Defendants.

Civil Action No. 3:23-cv-00795-CMC

**DEFENDANTS' AMENDED
RESPONSES TO LOCAL CIVIL
RULE 26.01 (D.S.C.)
INTERROGATORIES**

Defendants Wallace H. Jordan, Jr., J. David Weeks, Beth E. Bernstein, Paula Rawl Calhoon, Micajah P. Caskey, IV, Neal A. Collins, John Richard C. King, Robby Robbins, J. Todd Rutherford, and Leonidas E. Stavrinakis, in their official capacities as members of The House of Representatives Legislative Ethics Committee (collectively, "Defendants"), respectfully respond to the Interrogatories required by Rule 26.01 of the Local Civil Rules (D.S.C.) as follows:

- (A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE: Defendants are unaware of any persons or legal entities that may have a subrogation interest in any claim by Plaintiff.

- (B) As to each claim, state whether it should be tried jury or nonjury and why.

RESPONSE: Plaintiff's claims involve questions of law and Plaintiff has not demanded a jury trial on any claim. Defendants agree this case should be tried nonjury

- (C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

RESPONSE: No Defendant is a publicly owned company. No publicly owned company is any Defendant's parent, subsidiary, partner or affiliate, or owns ten percent or more of its shares. No Defendant owns ten percent or more of any publicly owned company's outstanding shares.

- (D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE: While the Columbia Division is where the House of Representatives Legislative Ethics Committee conducts business, some but not all Defendants reside in this Division. Defendants believe that the Columbia Division is the appropriate division for this action.

- (E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that may be related regardless of whether they are still pending. Whether cases are

related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE: No.

(F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE: Defendants are properly identified.

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

RESPONSE: Defendants do not contend that some other person or legal entity is liable to them. Further, Defendants do not believe that they are or any other party is liable to Plaintiff based on the disputed allegations in Plaintiff's Complaint.

Respectfully submitted,

s/ Susan P. McWilliams

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April 13, 2023
Columbia, South Carolina